

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HEATHER KIERNAN,

Plaintiff,

v.

Civil Action No. 10131-MLW

**ARMORED MOTOR SERVICES OF
AMERICA, INC. and FRANCISCO
CIAMBRIELLO,**

Defendants.

DECLARATION OF COUNSEL

Pursuant to 28 U.S.C. §1746, I, Allison Romantz, hereby declare, certify, verify and state under penalty of perjury that the following declaration is true and correct to the best of my knowledge.

1. I am an attorney in good standing, licensed to practice law in Massachusetts, and admitted to practice in the United States District Court for the District of Massachusetts. I am counsel for the defendant Armored Motor Services Of America, Inc. ("AMSE").

2. I have received from plaintiff's counsel the treatment records from two facilities where plaintiff sought counseling. Those materials were produced to me pursuant to a confidentiality agreement that limits their disclosure.

3. The treatment records contain references attributed to the plaintiff that suggest that there were ongoing domestic issues between plaintiff and her husband, at the time of the assault alleged in the complaint and thereafter.

Signed under the pains and penalties of perjury this 3d day of June, 2005.


Allison Romantz